IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re: Bankruptcy No. 16-10636-TPA

Robert L. Lyons Chapter 13

and Laura M. Lyons

Debtors

Document No. 22

Robert L. Lyons And Laura M. Lyons Movants

Vs. Bay City, Christopher Demarco DMD,

Coml Accept, Creditech, Navient, **Diversified Consultant, ECCU, First** Federal Credit, First Premier Bank, Firstpoint Coll, Fnb Cons Disc, Hand Mircrosurgery, Holiday Financial, IC System Inc. IRS, Jefferson Capital, Justin Lyons, MediCredit, Midland

Funding, North East Chiropractic, NW Cons Disc, NWSB, PA Dept Of Labor & Industry, Professional Acct Mngmt, Saint Vincent Institute,

St Vincent FCU, Verizon, Widget Financial, John C. Melaragno Esq. Chapter 7 Trustee

Respondents

MOTION TO CONVERT A CHAPTER 7 CASE TO A CHAPTER 13 CASE

The Debtors, pursuant to 11 U.S.C. § 706(a), hereby elect to convert the above-captioned Chapter 7 case to a case under Chapter 13 of the Bankruptcy Code. The Debtors are entitled to convert his case because:

- 1. This case, filed on June 30, 2016, has not been previously converted under sections 1112 or 1307 of the Bankruptcy Code.
- 2. The Debtors are eligible to be debtors under Chapter 13 of the Bankruptcy Code.

WHEREFORE, the Debtors pray for relief under Chapter 13 of the BankruptcyCode.

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Respectfully submitted,

Date: August 24, 2016

By /s/ Rebeka A. Seelinger

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